

UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

FEB 13 2024

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICOMITCHELL R. FULTON
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SHANNON CONCHO and
LOUANN JOHNSON,

Defendants.

CRIMINAL NO. 24-189 MVCount 1: 18 U.S.C. §§ 1153, 113(a)(6):
Assault Resulting in Serious Bodily Injury; 18

U.S.C. § 2: Aiding and Abetting;

Count 2: 18 U.S.C. § 373: Solicitation to
Commit a Crime of Violence.INDICTMENT

The Grand Jury charges:

Count 1

On or about September 3, 2023, in Indian Country, in McKinley County, in the District of New Mexico, the defendants, **SHANNON CONCHO** and **LOUANN JOHNSON**, both Indians, assaulted John Doe, and the assault resulted in serious bodily injury.

In violation of 18 U.S.C. §§ 1153, 113(a)(6), and 2.

Count 2

On or about September 3, 2023, in McKinley County, in the District of New Mexico and elsewhere, the defendant, **SHANNON CONCHO**, with the intent that one and more persons engage in conduct constituting a felony that has as an element the use, attempted use and threatened use of physical force against the person of another in violation of the laws of the United States, and under circumstances strongly corroborative of that intent, did solicit, command, induce, and endeavor to persuade such other persons to engage in such conduct, that is to commit assault resulting in serious bodily injury in violation of 18 U.S.C. §§ 1153 and 113(a)(6).

In violation of 18 U.S.C. § 373.

A TRUE BILL:



Assistant United States Attorney



FOREPERSON OF THE GRAND JURY